

# EXHIBIT D

THE STATE OF NEW HAMPSHIRE

ROCKINGHAM, SS

DERRY FAMILY DIVISION

In the matter of:

Janice D'Angelo and Stephen D'Angelo

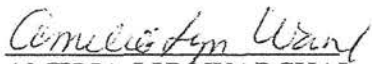
Docket No.: 622-2004-DM-00276

**AFFIDAVIT OF AMELIA-LYN WARCHAL**

I, Amelia-Lyn Warchal, hereby state and depose as follows:

- 1) My name is Amelia-Lyn Warchal and I am an associate attorney employed by D'Angelo & Hashem, LLC, a Massachusetts Limited Liability company;
- 2) D'Angelo & Hashem, LLC, is not a party to the above-captioned proceedings nor has it been *subpoenaed* to produce records;
- 3) I have conferred with the Massachusetts Office of Bar Counsel regarding the records sought by Petitioner;
- 4) My understanding, upon conferring with Bar Counsel, is that Respondent and the attorneys of D'Angelo & Hashem, LLC, cannot produce confidential client records, such as those sought by Petitioner, without consent of the clients or a court order;
- 5) No such consent is known to exist;
- 6) If production is made without such consent or court order, my further understanding from Bar Counsel is that Respondent and the attorneys of D'Angelo & Hashem, LLC, could be subject to sanction up to and including disbarment; and
- 7) As an employee of D'Angelo & Hashem, LLC, I do not consent to the production or other disclosure of any records relating to me, including payroll records, in this proceeding, as I have a right to privacy per Mass.Gen.Laws, ch. 214, sec. 1B;
- 8) If Respondent or D'Angelo & Hashem, LLC, attempts to produce such records in violation of my right to privacy, I intend to seek all available legal remedies against him.

SWORN AND SUBSCRIBED UNDER THE PAINS AND PENALTIES OF PERJURY  
THIS 7<sup>TH</sup> DAY OF MARCH 2011.


  
AMELIA-LYN WARCHAL  
D'Angelo & Hashem, LLC  
401 Andover Street, Suite 202

North Andover, MA 01845  
978-687-8100

COMMONWEALTH OF MASSACHUSETTS

COUNTY OF ESSEX

On this 7<sup>th</sup> day of March, 2011, personally appeared AMELIA-LYN WARCHAL and acknowledged the foregoing statements to be true to the best of his/her knowledge and belief. Before me,

  
Jay Marshall Wolman, Notary Public  
My commission expires: 11-8-2013  
Seal

